

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

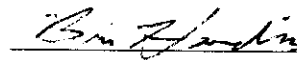
v.)

VICTOR BELOV,
Defendant)

Mag. Judge Case No. 04 mc 432 RBC

AFFIDAVIT IN SUPPORT OF ARREST

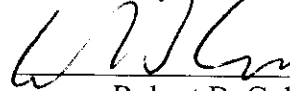
I, Brian Hendricks, Inspector, United States Postal Service, do hereby make oath before the Honorable Robert B. Collings, United States Magistrate Judge for the District of Massachusetts that upon knowledge coming to me in connection with my official duties and as part of the official records of my office, I am advised that there is presently outstanding a warrant of arrest for one VICTOR BELOV on an indictment filed in the District of Colorado charging the defendant with mail fraud and counterfeit securities in violation of 18 U.S.C. §§ 1341 and 513, and I do hereby make oath that this warrant of arrest is outstanding in said District on the basis of the information set out above. A copy of said warrant is attached.



Brian Hendricks
Inspector
U.S. Postal Service

JAN 14 2004

Subscribed and sworn to before me this ____ day of January, 2004.



Robert B. Collings
United States Magistrate Judge

HON. ROBERT B. COLLINGS
UNITED STATES MAGISTRATE JUDGE
United States District Court
United States Courthouse, - Suite 6420
1 Courthouse Way
Boston, MA 02210

DOCKETED

1

AO 442 (Rev 5/85) Warrant for Arrest

United States District Court

DISTRICT OF COLORADO

UNITED STATES OF AMERICA

v.

VICTOR BELOV

WARRANT FOR ARREST

CASE NUMBER:

04-CR-012F

TO: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest VICTOR BELOV and bring him

forthwith to the nearest magistrate to answer a(n)

☒ Indictment ☐ Information ☐ Complaint ☐ Order of Court ☐ Violation Notice ☐ Probation Violation Petition

charging him with: Mail Fraud, Forged State Securities, Removing Motor Vehicle Identification Number, and Altering Odometer

in violation of Title 18 U.S.C. § 1341, Title 18 U.S.C. § 513, Title 18 U.S.C. § 511, and Title 18 U.S.C. § 32703(2)

GREGORY C. LANGHAM
Clerk, U. S. District Court

Name of Issuing Officer

Title of Issuing Officer

Signature of Issuing Officer

Denver, Colorado

Date and Location

(By) Deputy Clerk

Bail fixed at \$

by

Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant at

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST

2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Case No.

04 - CR - 012F

JUN - 7 PM 3:39
GREGORY C. SHAM

UNITED STATES OF AMERICA,

BY _____ DEP. CLK

Plaintiff,

v.

1. VICTOR BELOV,
2. YEVGENIY SHVETS, and
3. PETR KRIVTSOV,

Defendants.

I, the undersigned, Clerk of the
United States District Court for the
District of Colorado, do hereby
certify that the foregoing is a true
and correct copy of the original
filed in the above captioned case.
Dated this 8th day of June, 2004.
Gregory C. Sham
Deputy

INDICTMENT

Title 18, United States Code, Section 1341

Mail Fraud

Title 18, United States Code, Section 513

Forged State Securities

Title 18, United States Code, Section 511

Removing Motor Vehicle Identification Number

Title 18, United States Code, Section 2314

Fraudulent Transportation Of Vehicle In Interstate Commerce

Title 49, United States Code, Section 32703(2)

Altering Odometer

Title 18, United States Code, Section 2

Aiding and Abetting

COUNT 1

The Grand Jury charges that:

SCHEME TO DEFRAUD

1. Beginning in or about October 1999 and continuing through in or about February 2003, in the State and District of Colorado, and elsewhere, VICTOR BELOV, aided and abetted by YEVGENIY SHVETS and PETR KRIVTSOV, defendants herein, along with others known

and unknown to the Grand Jury, devised and intended to devise a scheme to defraud the state of Colorado and individuals who purchased from defendants rebuilt automobiles which had been declared salvage by the state of Colorado. Specifically, defendants falsely and fraudulently misrepresented facts concerning use of automobile parts used and extent of repairs made to repair the salvage automobiles; defendants did not disclose to buyers of these automobiles that the vehicles were rebuilt from salvage vehicles; defendants did not provide a state of Colorado Form DR 2710 "Rebuilt from Salvage Disclosure" to the vehicle purchaser as required by CRS 42-6-206.

2. At all times relevant to this Indictment, VICTOR BELOV was the owner or co-owner of Velvet Touch Auto Sales located at 3740 Wheeling Street, Unit #9, Aurora, Colorado, which was engaged in buying salvage automobiles from insurance company salvage pools and rebuilding them as working automobiles. Salvage automobiles are vehicles declared a total loss by insurance companies.

THE MANNER AND MEANS OF SCHEME

3. It was part of the scheme, and in furtherance of the execution of said scheme that, defendant BELOV, aided and abetted by defendants YEVGENIY SHVETS and PETR KRIVTSOV, purchased salvaged vehicles in the name of Velvet Touch Auto Sales.

4. It was part of the scheme, in furtherance of the execution of said scheme that, defendant BELOV falsely and fraudulently presented invoices and "SALVAGE TITLE AFFIDAVITS" to the Denver Police Department or the Colorado State Patrol for automobile parts allegedly used to repair the salvaged automobiles. The "SALVAGE TITLE AFFIDAVITS" and invoices submitted by defendant VICTOR BELOV were false and fraudulent.

5. It was part of the scheme, and in furtherance of the execution of said scheme that, the defendants used the "SALVAGE TITLE AFFIDAVIT" to obtain a state of Colorado Certified VIN Inspection (State Of Colorado DR 2704 form) and a Colorado Certificate of Title. Defendants then obtained an automobile title which was issued with a S Brand (rebuilt from salvage).

6. It was part of the scheme, and in furtherance of the execution of said scheme that, the defendants misrepresented the extent of damage to the salvage vehicle and misrepresented the parts required to repair said vehicle on the "SALVAGE TITLE AFFIDAVIT."

7. It was part of the scheme, and in furtherance of the execution of said scheme that, the defendants misrepresented the cost to repair the vehicle in the "SALVAGE TITLE AFFIDAVIT."

8. It was part of the scheme, and in furtherance of the execution of said scheme that, defendant VICTOR BELOV misrepresented in newspaper advertisements for sale of the rebuilt salvage automobiles that he (BELOV) was an individual seller and not a dealer.

9. It was part of the scheme, and in furtherance of the execution of said scheme that, the defendants misrepresented to vehicle purchasers that the automobiles to be sold had never been in an accident or repaired by failing to disclose that the vehicle was a rebuilt salvage vehicle and failed to provide a state of Colorado Form DR 2710, Rebuilt from Salvage Disclosure, to the vehicle purchaser as required by CRS 42-6-206, thereby causing buyers of the vehicles to pay higher prices for the vehicles than they otherwise would have paid and causing buyers to purchase vehicles they would not have purchased if they had known they were salvage vehicles.

The allegations in paragraphs 1 through 9 are realleged and incorporated herein by reference in each of Counts 1 through 9.

THE EXECUTION OF THE SCHEME

On or about the dates listed below, in the State and District of Colorado, for the purpose of executing the scheme, as set forth and incorporated herein by reference in paragraphs 1-9, VICTOR BELOV, YEVGENIY SHVETS, and PETR KRIVTSOV defendants herein, knowingly and unlawfully caused to be placed in authorized depositories for mail, to be sent and delivered by the United States Postal Service, according to the directions thereon, in violation of Title 18, United States Code, Section 1341, the following mail matter as set forth below:

COUNT	DATE	ITEM MAILED	MAIL LOCATION TO AND FROM
1	04/12/00	State of Colorado "Salvage" Certificate of Title No. 47S137132 for 1996 Honda VIN 1HGEJ6605TL0442875	Douglas County, Colorado, Department of Motor Vehicles to American Family Insurance Company
2	02/24/00	State of Colorado "S" Certificate of Title No. 10W040533 for 1999 Mazda VIN 1YVGF22D1X5843248	Adams County, Colorado, Department of Motor Vehicles to Victor Belov/Velvet Touch Auto Sales, 3740 Wheeling Street, Unit 9, Aurora, Colorado
3	06/30/00	State of Colorado "S" Certificate of Title No. 10W054328 for 1999 Mazda VIN 1YVGF22D1X5843248	Adams County, Colorado, Department of Motor Vehicles to Victor Belov/Velvet Touch Auto Sales, 3740 Wheeling Street, Unit 9, Aurora, Colorado
4	02/24/00	State of Colorado "S" Certificate of Title No. 64A178854 for 1999 Nissan VIN 1N4DL01D7XC190758	Adams County, Colorado, Department of Motor Vehicles to Velvet Touch Auto Sales, 3740 Wheeling Street, Unit 9, Aurora, Colorado

5	03/21/00	State of Colorado "S" Certificate of Title No. 10W045958 for 1995 Lexus VIN JT8JS47E0S0109275	Adams County, Colorado, Department of Motor Vehicles to Victor Belov/Velvet Touch Auto Sales, 3740 Wheeling Street, Unit 9, Aurora, Colorado
6	04/05/00	State of Colorado "S" Certificate of Title No. 64A181450 for 1996 Honda VIN 1HGCE6674TA001321	Adams County, Colorado, Department of Motor Vehicles to Velvet Touch Auto Sales, 3740 Wheeling Street, Unit 9, Aurora, Colorado
7	02/02/01	State of Colorado "S" Certificate of Title No. 07P293827 for 1998 Acura VIN JH4DC4351WS019577	Adams County, Colorado, Department of Motor Vehicles to Velvet Touch Auto Sales, 3740 Wheeling Street, Unit 9, Aurora, Colorado
8	02/14/01	State of Colorado "S" Certificate of Title No. 12R116390 for 1993 BMW VIN WBACB4314PFL05248	Adams County, Colorado, Department of Motor Vehicles to Yevgeniy Shvets, 4668 West 63 rd Drive, Arvada, Colorado
9	03/22/01	State of Colorado "S" Certificate of Title No. 68A007318 for 1995 BMW VIN WBAHE6328SGF30103	Adams County, Colorado, Department of Motor Vehicles to Velvet Touch Auto Sales, 3740 Wheeling Street, Unit 9, Aurora, Colorado

The foregoing was in violation of Title 18, United States Code, Sections 1341 and 2.

The allegations in paragraphs 1 through 9 are realleged and incorporated herein by reference in each of Counts 10 through 21.

COUNT 10

The Grand Jury further charges that:

On or about March 28, 2000, in the State and District of Colorado, VICTOR BELOV, defendant herein, knowingly and unlawfully made, uttered and possessed with intent to deceive another person and government, a forged Security of a State, to wit: State of Colorado form "SALVAGE TITLE AFFIDAVIT" which was submitted to obtain a State of Colorado Certified VIN Inspection (DR 2704 form) and Colorado Certificate of Title No. 64A178854 for a 1999 Nissan Altima, all in violation of Title 18, United States Code, Section 513.

COUNT 11

The Grand Jury further charges that:

On or about April 5, 2000, in the State and District of Colorado, VICTOR BELOV, defendant herein, knowingly and unlawfully made, uttered and possessed with intent to deceive another person and government, a forged Security of a State, to wit: State of Colorado form "SALVAGE TITLE AFFIDAVIT" which was submitted to obtain a State of Colorado Certified VIN Inspection (DR 2704 form) and Colorado Certificate of Title No. 64A181450 for a 1996 Honda Accord, all in violation of Title 18, United States Code, Section 513.

COUNT 12

The Grand Jury further charges that:

On or about May 8, 2000, in the State and District of Colorado, VICTOR BELOV, defendant herein, knowingly and unlawfully made, uttered and possessed with intent to deceive another person and government, a forged Security of a State, to wit: State of Colorado form "SALVAGE TITLE AFFIDAVIT" which was submitted to obtain a State of Colorado Certified VIN Inspection (DR 2704 form) and Colorado Certificate of Title No. 10W052872 for a 1996 Honda Civic, all in violation of Title 18, United States Code, Section 513.

COUNT 13

The Grand Jury further charges that:

On or about May 26, 2000, in the State and District of Colorado, VICTOR BELOV, defendant herein, knowingly and unlawfully made, uttered and possessed with intent to deceive another person and government, a forged Security of a State, to wit: State of Colorado form "SALVAGE TITLE AFFIDAVIT" which was submitted to obtain a State of Colorado Certified VIN Inspection (DR 2704 form) and Colorado Certificate of Title No. 10W054980 for a 1996 Honda Civic, all in violation of Title 18, United States Code, Section 513.

COUNT 14

The Grand Jury further charges that:

On or about March 6, 2000, in the State and District of Colorado and elsewhere, VICTOR BELOV, defendant herein, having devised and intending to devise a scheme to defraud, knowingly transported in interstate commerce, in the execution and concealment of the scheme to defraud, from the District of Colorado to Arizona, a 1995 Lexus, VIN JT8JS47E0S0109275,

with a value of more than \$5,500, all in violation of Title 18 United States Code, Section 2314.

COUNT 15

The Grand Jury further charges that:

On or about July 13, 2000, in the State and District of Colorado, VICTOR BELOV defendant herein, knowingly and unlawfully made, uttered and possessed with intent to deceive another person and government, a forged Security of a State, to wit: State of Colorado form "SALVAGE TITLE AFFIDAVIT" which was submitted to obtain a State of Colorado Certified VIN Inspection (DR 2704 form) and Colorado Certificate of Title No. 10W054328 for a 1999 Mazda 626, all in violation of Title 18, United States Code, Section 513.

COUNT 16

The Grand Jury further charges that:

On or about February 12, 2001, in the State and District of Colorado, VICTOR BELOV and PETER KRIVTSOV, defendants herein, knowingly and unlawfully made, uttered and possessed with intent to deceive another person and government, a forged Security of a State, to wit: State of Colorado form "SALVAGE TITLE AFFIDAVIT" which was submitted to obtain a State of Colorado Certified VIN Inspection (DR 2704 form) and Colorado Certificate of Title No. 68A004580 for a 1998 Acura Integra, all in violation of Title 18, United States Code, Sections 513 and 2.

COUNT 17

The Grand Jury further charges that:

On or about June 18, 2001, in the State and District of Colorado, VICTOR BELOV and

COUNT 18

On or about July 3, 2001, in the State and District of Colorado, VICTOR BELOV, defendant herein, knowingly and unlawfully made, uttered and possessed with intent to deceive another person and government, a forged Security of a State, to wit: State of Colorado form "SALVAGE TITLE AFFIDAVIT" which was submitted to obtain a State of Colorado Certified VIN Inspection (DR 2704 form) and Colorado Certificate of Title No. 68A007318 for a 1995 BMW 540-I, all in violation of Title 18, United States Code, Section 513.

COUNT 19

On or about February 20, 2003, in the State and District of Colorado, PETR KRIVTSOV, defendant herein, knowingly and unlawfully removed the identification number for a motor vehicle, to wit: vehicle identification number (VIN) 2C3HC56F1TH173386, for a 1996 Chrysler, all in violation of Title 18, United States Code, Section 511.

COUNT 20

The Grand Jury further charges that:

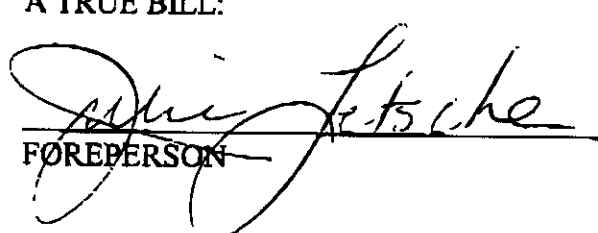
On or about February 20, 2003, in the State and District of Colorado, PETR KRIVTSOV, defendant herein, knowingly and unlawfully removed the identification number for a motor vehicle, to wit: 1998 Acura Integra, all in violation of Title 18, United States Code, Section 511.

COUNT 21

The Grand Jury further charges that:

On or about July 7, 2002, in the State and District of Colorado, PETR KRIVTSOV, defendant herein, knowingly and unlawfully reset and altered an odometer of a 1998 Acura Integra, VIN number JH4DC239WSCG2481, from approximately 44,540 miles to approximately 13,116 miles, with the intent to change the mileage registered by the odometer, all in violation of Title 49, United States Code, Section 32703(2).

A TRUE BILL:


FOREPERSON

JOHN W. SUTHERS
UNITED STATES ATTORNEY


By: JOSEPH MACKEY
Assistant U.S. Attorney